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*Counsel for Defendant Paul M. Daugerdas*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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:  
UNITED STATES OF AMERICA, :  
:  
- v - : Case No. S6 09 Cr. 581 (WHP)  
:  
PAUL M. DAUGERDAS, et al., :  
:  
Defendants. :  
:  
-----X

NOTICE OF DEFENDANT PAUL M. DAUGERDAS'S  
PRE-TRIAL MOTIONS IN LIMINE

PLEASE TAKE NOTICE that upon the annexed Declaration of Brian D. Linder with exhibits and the accompanying Memorandum of Law in Support of Defendant Paul M. Daugerdas's Pre-Trial Motions In Limine, dated July 19, 2013, defendant Paul M. Daugerdas, by his undersigned counsel, hereby moves this Court for:

1. An Order affirming the Orders entered by this Court in response to motions in limine that Mr. Daugerdas (and his co-defendants) filed in connection with his first

trial, as well as the agreements reached between Mr. Daugerdas (and his co-defendants) and the government concerning same;

2. An Order precluding the government from offering the “Blanchard Memorandum” (defined in the accompanying Memorandum of Law in Support of Defendant Paul M. Daugerdas’ Pre-Trial Motions In Limine, dated July 19, 2013) into evidence at trial;

3. An Order limiting the testimony of David DeRosa, the government’s expert witness pursuant to the Court’s previous ruling; and

4. An Order precluding the introduction of Government Exhibit 500-3.

Dated: New York, New York  
July 19, 2013

Respectfully submitted,

CLAYMAN & ROSENBERG LLP

By: \_\_\_\_\_ /S/

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